

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 1037

**CERTIFICATION OF COUNSEL REGARDING
TWENTY-FIRST NOTICE OF REJECTION OF CERTAIN
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On May 30, 2025, the Debtors filed the *Twenty-First Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 1037] (the “Rejection Notice”) regarding the rejection of certain contracts set forth in the Rejection Notice (the “Original Rejection List”). Attached to the Rejection Notice was a proposed form of rejection order (the “Rejection Order”) authorizing the rejection of the contracts on the Original Rejection List.
2. The deadline to object to the Rejection Notice was June 13, 2025 (the “Objection Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Prior to the Objection Deadline, Dunbar Security Products, Inc. (“Dunbar”) provided informal comments to the Rejection Notice regarding the accuracy of the contracts listed in rows 78, 79, 81 & 83 of the Original Rejection List.

4. Attached as **Exhibit A** is a revised Rejection Order (the “Revised Rejection Order”), which resolves the informal comments received from Dunbar regarding the accuracy of the description of the contracts. A redline comparing the Revised Rejection Order to the Rejection Order is attached hereto as **Exhibit B**. Dunbar has agreed that the Revised Rejection Order resolves its informal comments to the to the Rejection Notice.

5. Accordingly, the Debtors request entry of the Revised Rejection Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

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Dated: July 3, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

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